

Public Notice – Hazardous Waste Combustor MACT

Georgia Gulf Chemicals & Vinyls, LLC
Plaquemine, LA
AI 2455

On March 31, 2006 Georgia Gulf Chemicals & Vinyls, LLC (GGCV) submitted to the U.S. Environmental Protection Agency its Initial Notification that it has existing sources subject to the National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors (40 CFR 63 Subpart EEE) (HWC MACT).

GGCV operates a hydrochloric acid production furnace (Industrial Furnace) subject to the HWC MACT. It also operated a Nebraska Boiler but intends to remove the boiler from service prior to the HWC MACT compliance date of October 14, 2008.

The affected source at GGCV is a hydrochloric acid production furnace (Source I.D. 14-78). GGCV uses the furnace primarily for burning hazardous waste generated in the Ethylene Dichloride (EDC)/Vinyl Chloride (VCM) Plant, but also burns emissions from process vents and storage tank vents in the EDC/VCM Plant as needed. The EDC/VCM Plant waste may include the light ends and heavy ends from EDC distillation operations, equipment cleaning material and spent quality control samples, and the purge stream from the direct chlorination reactor for tar removal. The hazardous waste combustion system consists of an industrial furnace, a forced draft combustion air blower, a waste heat boiler, an HCl recovery system consisting of four absorbers in series, and a packed caustic scrubber to control chlorine and HCl emissions. The industrial furnace is permitted as a Resource Conservation and Recovery Act hazardous waste incinerator. The affected source is located at 26100 LA 405 (River Road), three miles east of Plaquemine, LA.

GGCV has developed a draft Notice of Compliance (NIC) with respect to the Industrial Furnace. Copies can be viewed at the Louisiana Department of Environmental Quality, 602 N. Fifth Street, Baton Rouge, LA. The facility contact person is Dave Goldsmith, PO Box 629, Plaquemine, LA 70765-0629, 225-685-2677.

A public meeting will be held to present GGCV's plans to comply with the HWC MACT. The meeting will be held at 5:00 pm Tuesday, September 26, 2006 in GGCV's Human Resources Conference Room, located on the west end of GGCV's Administration Building located at 26100 LA 405 (River Road), three miles east of Plaquemine, LA. People are encouraged to contact Mr. Goldsmith at least 72 hours before the meeting if they need special access to participate.



Georgia Gulf Chemicals & Vinyls, LLC
(225) 685-2500
(225) 298-2500

26100 LA Highway 405
Post Office Box 629
Plaquemine, LA 70765-0629

August 15, 2006

Certified 7002 2410 0006 7700 8075

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

original to

AT 2455
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copy to PPG/ghosh
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DEQ - OES

Re: Notice of Intent to Comply
Georgia Gulf Chemicals and Vinyls, L.L.C.
P.O. Box 629
Plaquemine, LA 70765-0629
USEPA RCRA ID No.: LAD057117434

To Whom It May Concern:

In accordance with Title 40, Part 63.1210(b)(2), Code of Federal Regulations (40 CFR 63), Georgia Gulf Chemicals and Vinyls, L.L.C. is submitting a draft Notification of Intent to Comply (NIC) to the Louisiana Department of Environmental Quality (LDEQ) for our Plaquemine Plant.

Georgia Gulf is required to make a draft of the NIC available for public review no later than 30 days prior to a public meeting, which will be held on Tuesday, September 26, 2006. Notification of the availability of the draft NIC at the LDEQ has been provided to the mailing list and a newspaper advertisement and radio announcement will be made on or before August 27, 2006. Georgia Gulf is requesting that the LDEQ make the enclosed draft NIC available for review by the public, upon request for the duration of the public notice period.

If you have any questions or need additional information, please contact me at (225) 685-2677.

Sincerely,

Dennis Fec
Environmental Manager

Enclosure

NOTIFICATION OF INTENT TO COMPLY (NIC):

40 CFR 63 SUBPART EEE – NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FROM HAZARDOUS WASTE COMBUSTORS (“HWC NESHP”)

(X) Initial NIC () Revised NIC

Part (i) General Information

(A) Owner Information:	
Company Name: Georgia Gulf Chemicals and Vinyls, L.L.C.	
Contact: Mr. David Goldsmith	Title: Principal Engineer, Environmental Services
Mailing Address: P.O. Box 629, Plaquemine, LA 70765-0629	
Email Address: goldsmithd@ggc.com	
Phone No.: (225) 298-2677	Fax No.: (225) 687-0294
(A) Operator Information:	
Facility Name: Georgia Gulf Chemicals and Vinyls, L.L.C.	USEPA RCRA ID No.: LAD057117434
Physical Address: 26100 Highway 405 South, Plaquemine, Iberville Parish	
Contact: Mr. David Goldsmith	Title: Principal Engineer, Environmental Services
Mailing Address: P.O. Box 629, Plaquemine, LA 70765-0629	
Email Address: goldsmithd@ggc.com	
Phone No.: (225) 298-2677	Fax No.: (225) 687-0294
(A) Source Information:	
(B) CAA Designation: (X) Major () Area	

(C) Waste Minimization and Emission Control Techniques Being Considered:
Based on previous stack testing, Georgia Gulf currently believes that no additional control techniques will be necessary to demonstrate compliance with the HWC MACT emission standards for existing HCl production furnaces.
As the generator of all hazardous waste streams combusted at the site, Georgia Gulf makes continuous efforts to reduce the amount of hazardous waste generated through good housekeeping and production practices that minimize the amount of off-specification and waste material produced at the facility. No additional waste minimization techniques are deemed necessary or practicable at this time.

(D) Emission Monitoring Techniques Being Considered:
Georgia Gulf currently demonstrates compliance with hazardous waste combustion requirements of the RCRA BIF rules using continuous monitoring systems for combustion temperature, scrubber pH, and carbon monoxide. No additional parametric or emissions monitors are required for demonstrating compliance with the HWC MACT emission standards.

(E) Waste Minimization And Emission Control Techniques Effectiveness:
Georgia Gulf conducted a trial burn on the HCl production furnace in May 2006. Results from this test shows that compliance with all of the HWC MACT emission standards were demonstrated using existing air pollution control techniques.

(F) Evaluation Criteria Used Or To Be Used To Select Waste Minimization And/Or Emission Control Techniques:	
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Not Applicable	
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(G) Criteria Used To Comply With The Emission Standards Of This Subpart:

Georgia Gulf intends to comply with the HWC MACT emission standards through management of metals and chlorine in the feed streams, utilization of any required continuous monitoring systems, and operational controls on the HCl production furnace.

Part (ii) Key Activities and Scheduled Dates

(A) Engineering Designs For Emission Control Systems or Process Changes for Emissions:

Not Applicable

(B) Internal or External Resources For Installing Emission Control Systems Or Making Process Changes For Emission Control, Or Issue Orders For The Purchase Of Component Parts To Accomplish emission Control or Process Changes:
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The Nebraska Boiler, which is currently used to combust hazardous waste liquids at the site, last received hazardous waste fuels in June 2006. Georgia Gulf anticipates initiation of closure activities before June 30, 2007; however, it is possible that RCRA closure will not be initiated until the compliance date on October 14, 2008.

(C) Construction Applications:

Not Applicable

(D) On-Site Construction, Installation Of Emission Control Equipment, Or Process Change:

Not Applicable

(E) Complete On-Site Construction, Installation Of Emission Control Equipment, Or Process Change:
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Not Applicable

(F) Final Compliance:

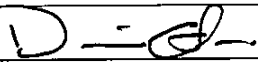
Georgia Gulf will achieve compliance no later than October 14, 2008.
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If necessary, Georgia Gulf will submit a Comprehensive Performance Test Plan no later than April 14, 2008.
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If necessary, Georgia Gulf will commence the Comprehensive Performance Test no later than April 14, 2009.

Georgia Gulf will submit a Notification of Compliance no later than October 14, 2009
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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Print Name: Dennis C. Fec
Signature: 
Title: Env. Mgr. Date: 8/15/06

TAYLOR, PORTER, BROOKS & PHILLIPS

LLP

ATTORNEYS AT LAW

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2006 AUG 16 AM 10:22

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August 11, 2006

original to _____

copy to _____

WRITER'S DIRECT DIAL NUMBER: 225-381-0240
e-mail address: Robert.Coco@taylorporter.com

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Dr. Chuck Brown
Assistant Secretary
Louisiana Department of Environmental Quality
Office of Environmental Services
P.O. Box 4313
Baton Rouge, LA 70821-4313

RE: Bollinger Fourchon L.L.C.
AI #: 27468
Proposed Air Permit
Tempo Activity No. PER 2005002

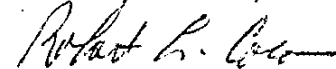
Dear Dr. Brown:

Please find enclosed Bollinger Fourchon L.L.C.'s timely comments to the proposed air permit. These comments were previously sent in MS Word format to Mr. Scott Pierce by e-mail.

If you have any questions, please contact me.

Very truly yours,

TAYLOR, PORTER, BROOKS & PHILLIPS L.L.P.



Robert L. Coco

RLC/lmp

cc: Cheryl Nolan, LDEQ, Permits w/encl. ✓
Scott Pierce, LDEQ, Permits w/encl. ✓

August 11, 2006
Page 2

Jodi Satches, Bollinger Shipyards w/encl.

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Bollinger Lockport, L.L.C.	AI #:	27468	TEMPO Activity No:	PER20050002
Facility Name:	Bollinger Fourchon, L.L.C.	Remarks Submitted by:	Jodi Satches		
Permit Writer:	Scott Pierce	Permit Writer Email address:	Scott.Pierce@la.gov		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permit Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information *must be submitted*. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – ***DO NOT COMPLETE THIS SECTION.*** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during the public comment period.

- Additional rows may be added as necessary.

- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Section III Air Permit Briefing Sheet (Estimated Emissions from facility)	Please provide more leeway with the single VOC TAP and single non-VOC TAP TPY facility emission rate. Previous Bollinger permits have provided more flexibility (Algiers) in relation to their application emission rates. Please increase the limits to 7 TPY single VOC TAP and 3 TPY non-VOC TAP.	
Section VIII Air Permit Briefing Sheet (Insignificant Activities)	Portable fuel tank for temporary maintenance should read < 5 TPY, not > 5 TPY.	
Section VIII Air Permit Briefing Sheet (Insignificant Activities)	Remove “Noncommercial water washing of 55 gallon drums < 3% full”. Facility does not conduct this activity.	
General Conditions	Number XV: revise wording to read “The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC	

	33:III.927 as applicable.	
General Information	ID: LA0000921486: Shell Offshore Inc - Fourchon Term: Hazardous Waste Notification, Starting Date: 08-11-1994 does not belong to Bollinger Shipyards.	
General Information	T-057-12300, Solid Waste Facility No: Starting Date: 06-09-2004 does not belong to Bollinger Shipyards	
General Information page	Location of Front Gate, UTM different than facility original submittal. (Differ by 2" (minutes)). Recheck.	
General Information page	Add Craig Roussel as Responsible Official in place of Ben Bordelon.	
General Information page	Please remove permit ID LA0000921486. It is not for a Bollinger facility. Please remove Daniel O'Bryan as the Solid Waste contact.	
Inventories page 1	Please move max operating rates for ARE 002 Abrasive Blasting, ARE 003 Welding Operations, ARE 004 Metal Cutting, EQT001 Misc. Combustion to the normal operating rates column.	
Inventories page 1	The max operating rate listed for EQT001 Misc. Combustion should be in the normal operating column and the value should be 2969.5 MMBtu/yr, not 3 MMBtu/yr.	
Emission Rates for TAP/HAP	Avg lb/hr for benzene under EQT 003 should be 0.014 per application. Benzene TPY for EQT 003 should be 0.0149 rounded to 0.015.	
Emission Rates for TAP/HAP	Max lb/hr for chromium VI under ARE 002 should be 0.0149 rounded to 0.015 per application.	
Emission Rates for TAP/HAP	Max lb/hr for copper under ARE 003 should be 0.034 per application.	
Emission Rates for TAP/HAP	Max lb/hr for toluene under EQT 002 should be 0.022 per application.	
Emission Rates for TAP/HAP	Avg lb/hr for toluene under EQT 003 should be 0.033 per application.	
Emission Rates for TAP/HAP	Avg lb/hr for xylene under EQT 003 should be 0.071 per application.	
Emission Rates for TAP/HAP	TPY for xylene under EQT 003 should be 0.093 per application.	
Emission Rates for TAP/HAP	Benzene for EQT 003 should not be < 0.01 for avg lb/hr and TPY. IT should be 0.01 lb/hr avg and TPY.	
Specific Requirements	Please remove number 24 from the ARE003 Welding Operations specific requirements. It is not applicable to welding and no other Bollinger permit has this regulation for welding. The required lb/hr is not even in the range of Table 3 in LAC 33:III.1321.A. Chapter 13 is addressed by complying with 1311.C.	
Specific Requirements	Please remove number 32 from EQT001 Misc Combustion. Recent issued BMC permit does not have this regulations included in the permit for combustion sources.	

Specific Requirements	Remove requirement to conduct Visual Emission checks for Welding and Cutting. Other Bollinger permits (i.e. BMC facility does not have the requirement). Remove requirement numbers 26, and 31.	
Specific Requirements	Number 4: Remove references to LAC 33:III.2123.D.3 (does not apply) and replace with 2123.D.8.	
Specific Requirements	Number 5: Remove. None of the test methods in 2123.E is applicable to Bollinger's requirements under 2123C and D.	
Specific Requirements	Number 8: Make record keeping requirements consistent numbers 6, 8, 30 and 45 record retention times.	
Specific Requirements	Remove number 13. The requirement is a duplicate of number 7.	
Specific Requirements	Number 16 and number 21 remove not required in BMC permit nor other similar Shipyards.	
Specific Requirements	Remove number 22. Not applicable to Welding Operations.	
Specific Requirements	Remove number 23. Not applicable to Welding Operations.	
Specific Requirements	Remove number 27. Not applicable to Metal Cutting Operations.	
Specific Requirements	Remove number 28 and 29. Not applicable to Metal Cutting.	
Specific Requirements	Remove numbers 41 and 42 relating to discharges of odorous substances this requirement is not required in other facility permits.	

Specific Requirements	Remove numbers 43 and 44 from Facility Wide requirements. Requirements already included under Specific Requirements as it applies to the Operations.	
Specific Requirements	Remove 46: Requested flexibility provided in Air Briefing Sheets in addition calculations not provided monthly.	
Specific Requirements	Number 46: Revise language to read: "Emissions of each individual VOC TAP occurring at this facility shall be limited to not more than to 7 TPY single VOC TAP and 3 TPY non-VOC TAP. However, total emissions of all TAP's at the entire facility shall be limited to not more than 11,492 tons/yr".	
Specific Requirements - Blasting	Added Specific Requirement: Use of any material containing TAP listed in Table 51.1, 51.2, or 51.3 of LAC 33:III.5112 shall be permitted provided that its use does not cause total PM/PM10 emissions attributed to ARE002 to exceed 2.10 tons per year and that total TAP emissions attributed to ARE002 do not exceed 0.5 tons per year while facility wide total TAP emissions do not exceed 11,492 tons per year.	
Specific Requirements - Welding	Added Specific Requirement: Use of any material containing TAP listed in Table 51.1, 51.2, or 51.3 of LAC 33:III.5112 shall be permitted provided that its use does not cause total PM/PM10 emissions attributed to ARE003 to exceed 0.73 tons per year and that total TAP emissions attributed to ARE003 do not exceed 0.5 tons per year while facility wide total TAP emissions do not exceed 11,492 tons per year.	
Specific Requirements - Cutting	Added Specific Requirement: Use of any material containing TAP listed in Table 51.1, 51.2, or 51.3 of LAC 33:III.5112 shall be permitted provided that its use does not cause total PM/PM10 emissions attributed to ARE004 to exceed 0.94 tons per year and that total TAP emissions attributed to ARE004 do not exceed 0.5 tons per year while facility wide total TAP emissions do not exceed 11,492 tons per year.	